
From: Armijo, Maria (USANM)
Received: Tue 9/6/2016 4:16 PM
Ryan Villa; amy@abqnmllaw.com; Cori A. Harbour-Valdez; Ahmad Assed; Alex Olivas; Amy Jacks; Barry Porter; Billy Blackburn; BMB Law; Christopher Adams; Cori A. Harbour-Valdez; David Evans; Diego Esquibel; Donald Kochersberger; Donavon Roberts; Erlinda Ocampo Johnson; Greg Acton; Jeff Lahann; Jim Castle; Joe Spencer; Kari Morrissey; Larry Hammond; Marc Lowry; Marcia Morrissey; Margaret Strickland; Marshall Ray; Mary Stillinger; Michael Davis; Nate Chambers; Noel Orquiz; Orlando Mondragon; Patrick J Burke; Phillip Linder; Richard Jewkes; Rick Sindel; Robert Cooper; Theresa Duncan; Wayne Baker; arellanesattorney@yahoo.com; romerokeith@gmail.com; maalaw4@gmail.com; cjm@cjmlawfirm.com; bj@crow-law-firm.com; ghlaw707@gmail.com; santilawyer@gmail.com; gmitchehl@zianet.com; lawyer19742003@yahoo.com; jd@jdherreralaw.com; doug@couleurlaw.com; russelldeanclark@gmail.com
To:
Cc: Castellano, Randy (USANM); Beck, Matthew (USANM)
Subject: RE: USA v. DeLeon- 15-cr-4268- motion to vacate-position needed

Mr. Villa,

I believe one of the questions that was posed was whether the defendants in the 1613 RICO case oppose a continuance of their trial date in July as well. I don't believe that question has been answered. If it has, I apologize. Please let me know.

Assuming that all the defendants in the 1613 RICO case do NOT oppose a continuance in their case, the United States is not opposed to vacating the trial date currently set in March, 2017. However, after reviewing your motion, we are opposed to that motion per se because we disagree with some of the assertions made.

For instance, we are opposed to the following statements in your motion:

- (1) That the U.S. production is making it difficult for counsel to efficiently ascertain which documents are pertinent to a specific defendant and a specific count or counts. We disagree – for the most part, the discovery letters that we send out quite clearly indicate what discovery is contained in that batch of discovery, and what murder (etc...) it pertains to – and if it is in a “MISC” category – we provide descriptions of the discovery.
- (2) We believe we have already complied with discovery, and will continue to disclose materials as we receive them. Thus, we are opposed to the Court setting a deadline on the Government.
- (3) We disagree that there are 40,000 documents. Our indication via bates stamped material is that we have disclosed approximately 16,000 pages. Mr. Aoki calculates it differently when he includes other files such as telephone calls, etc....

Unless changes such as these are removed from the motion, and all the defendants in the 1613 RICO agree with vacating their trial date, we are opposed to the motion.

From: Ryan Villa [mailto:ryan@rjvllawfirm.com]
Sent: Tuesday, September 06, 2016 2:14 PM
To: Armijo, Maria (USANM); amy@abqnmllaw.com; Cori A. Harbour-Valdez; Ahmad Assed; Alex Olivas; Amy Jacks; Barry Porter; Billy Blackburn; BMB Law; Christopher Adams; Cori A. Harbour-Valdez; David Evans; Diego Esquibel; Donald Kochersberger; Donavon Roberts; Erlinda Ocampo Johnson; Greg Acton; Jeff Lahann; Jim Castle; Joe Spencer; Kari Morrissey; Larry Hammond; Marc Lowry; Marcia Morrissey; Margaret Strickland; Marshall Ray; Mary Stillinger; Michael Davis; Nate Chambers; Noel Orquiz; Orlando Mondragon; Patrick J Burke; Phillip Linder; Richard Jewkes; Rick Sindel; Robert Cooper; Theresa Duncan; Wayne Baker; arellanesattorney@yahoo.com; romerokeith@gmail.com; maalaw4@gmail.com; cjm@cjmlawfirm.com; bj@crow-law-firm.com; ghlaw707@gmail.com; santilawyer@gmail.com; gmitchehl@zianet.com; lawyer19742003@yahoo.com; jd@jdherreralaw.com; doug@couleurlaw.com; russelldeanclark@gmail.com
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Counsel,

I've heard back from all Defendants, except Defendants Patterson, Hernandez and Rodriguez. I think I left out Defendant Martinez's counsel in my original email, so they have now been added. All Defendants have responded that they concur, except Defendant Martinez, who's counsel Doug Couleur takes no position due to ongoing competency issues.

Ms. Armijo: Can you please tell me the government's position? I intend to file the motion tomorrow by close of business. I've attached an updated version that has some minor changes from the previous. The changes are mostly substantive, only stylistic and a couple typos. I've left highlighted those Defendants I've yet to hear from.

Would the attorneys, on behalf of **Defendants Patterson, Hernandez, Rodriguez and Martinez** please provide your position on a motion to vacate the March trial date?

Thanks.

Ryan J. Villa

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From: Armijo, Maria (USANM)
Sent: Friday, September 02, 2016 1:29:26 PM
To: Ryan Villa; amy@abqnlaw.com; Cori A. Harbour-Valdez; Ahmad Assed; Alex Olivas; Amy Jacks; Barry Porter; Billy Blackburn; BMB Law; Christopher Adams; Cori A. Harbour-Valdez; David Evans; Diego Esquibel; Donald Kochersberger; Donavon Roberts; Erlinda Ocampo Johnson; Greg Acton; Jeff Lahann; Jim Castle; Joe Spencer; Kari Morrissey; Larry Hammond; Marc Lowry; Marcia Morrissey; Margaret Strickland; Marshall Ray; Mary Stilling; Michael Davis; Nate Chambers; Noel Orquiz; Orlando Mondragon; Patrick J Burke; Phillip Linder; Richard Jewkes; Rick Sindel; Robert Cooper; Theresa Duncan; Wayne Baker; arellanesattorney@yahoo.com; romerokeith@gmail.com; erlindajohnsonlaw@comcast.net; ladar170@aim.com; maalaw4@gmail.com; cjm@cjmlawfirm.com; bj@crow-law-firm.com; ghlaw707@gmail.com; santilawyer@gmail.com; gmitchehl@zianet.com; lawyer19742003@yahoo.com; jd@jdherreralaw.com; mondragonom@att.net; jeff@lahannlaw.com; phillip@thelinderfirm.com; doug@couleurlaw.com; russelldeanclark@gmail.com
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Good afternoon Ryan,

We would like to know what all the defendants' position is prior to giving our position.

Thanks - Maria

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All,

This email is (hopefully) being sent to all parties U.S. and Defendants in the DeLeon case. I've attached a proposed motion to vacate the March trial date. Per Judge Browning's request, I need to hear from everyone on whether they oppose.

Thank you.

Ryan J. Villa

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